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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

JEREMY PHILLIP PUCKETT,

CASE NO. 2:22-00350-KJM-DB

Plaintiff,

**JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
DISCOVERY AND DISPOSITIVE
MOTION DEADLINES**

v.

COUNTY OF SACRAMENTO,
SACRAMENTO COUNTY SHERIFF'S
OFFICE, SACRAMENTO COUNTY
DISTRICT ATTORNEY'S OFFICE,
MARJORIE DURENBERGER, MARCI
MINTER, LORI GREGERSEN, WILLARD
BAYLES, ROBERT BELL, KAY
MAULSBY, DONALD HENRIKSON, AND
DOES 1, through 50,

Complaint Filed: 02/22/22

Defendants.

Plaintiff Jeremy Puckett ("Plaintiff") and Defendants County of Sacramento, Sacramento County District Attorney's Office, and Sacramento County Sheriff's Office (together "Entity Defendants"), and Defendants Marci Minter, Lori Gregersen, Willard Bayles, Robert Bell, Kay Maulsby, and Dr. Donald Henrikson (together with Entity Defendants, "Defendants"), by and through their undersigned counsel, jointly stipulate and agree as follows:

1. On February 22, 2022 Plaintiff filed the above-captioned lawsuit under 42 U.S.C. § 1983 against Defendants. (Dkt. 1).

2. On November 4, 2022, the court held a Scheduling Conference, and issued a bench order setting the following dates "fact discovery shall be completed by 11/17/2023; expert disclosures shall be completed by 01/19/2024; rebuttal expert witnesses shall be exchanged by 02/19/2024; all expert discovery shall be completed by 03/22/2024; and all dispositive motions, except for motions for continuances, temporary restraining orders or other emergency applications, shall be heard by 09/20/2024". (Dkt. 32).

3. Following resolution of a motion to dismiss, Defendants filed answers to Plaintiff's complaint on April 25, 2023 and July 31, 2023. (Dkt. 37 & 38).

4. On July 16, 2024, the court modified the pretrial scheduling order, extending the discovery deadlines. On October 9, 2024, the discovery deadlines were extended again, setting the current deadlines as follows: Fact Discovery - 1/31/2025; Expert Disclosure - 3/31/2025; Rebuttal expert disclosure - 5/5/2025; expert discovery deadline - 6/4/25; and all dispositive motions, except motions for continuances, temporary restraining order or other emergency applications - 9/17/2025.

5. The Parties have conferred and agree that good cause exists for modifications to the current case schedule. The parties have been engaged in substantial discovery since the last extension to the case deadlines. That has included responding to multiple sets of discovery and taking approximately 15 depositions. There are several depositions currently on calendar to be completed this month. Recently, the County amended its Rule 26 Disclosure to identify 4 additional witnesses. Plaintiff wants to depose those witnesses. However, the schedule is such that those depositions are not able to be completed by the January 31, 2025 deadline. As such, the parties have agreed to extend the fact discovery deadline to February 28, 2025.

6. Accordingly, the Parties hereby stipulate and agree, subject to the Court's Order, that the following deadlines be reset at follows:

- Fact discovery shall be completed by February 28, 2025.
- Expert disclosures deadline shall be completed by April 28, 2025.
- Rebuttal expert exchange deadline shall be exchanged by June 2, 2025.
- All expert discovery shall be completed by July 2, 2025.
- All dispositive motions, except for motions for continuances, temporary restraining orders or other emergency applications, shall be filed¹ by September 17, 2025. The deadlines for any dispositive motions shall be as follows:
 - Responses to all dispositive motions shall be filed within 30 days of the dispositive motion, but not later than October 17, 2025; and

¹ The parties suggest the deadline be triggered as "filed" rather than "heard" due to difficulties in calendaring and unpredictability in availability in the court's calendar.

- Replies shall be filed within 14 days of any responses to dispositive motions, but not later than October 31, 2025.

Dated: January 30, 2025

PORTER SCOTT
A PROFESSIONAL CORPORATION

By /s/Carl L. Fessenden
Carl L. Fessenden
Cruz Rocha
Attorneys for Defendants

Dated: January 30, 2025

SIMPSON THACHER & BARTLETT LLP

By /s/Alison Draikiwicz (Authorized on 1/27/25)
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Attorneys for Plaintiff

Dated: January 30, 2025

NORTHERN CALIFORNIA INNOCENCE
PROJECT

By /s/Karyn Sinuni-Towery (Authorized on 1/27/25)
Karyn Sinunu-Towery
Attorney for Plaintiff

Dated: January 30, 2025

RANKIN, SHUEY, MINTZ, LAMPASONA &
HARPER

By David E. Shuey (Authorized on 1/23/25)
David T. Shuey
Lauren Telfer

ORDER

The Court having reviewed the Parties' Joint Stipulation to Extend Discovery and Dispositive Motions Deadlines, IT IS HEREBY ORDERED that:

- Fact discovery deadline shall be continued from January 31, 2025 to February 28, 2025.
- Expert disclosures deadline shall be continued from March 31, 2025 to April 28, 2025.
- Rebuttal expert exchange deadline shall be continued from May 5, 2025 to June 2, 2025.
- The deadline to complete all expert discovery shall be continued from June 4, 2025 to July 2, 2025.
- All dispositive motions, except for motions for continuances, temporary restraining orders or other emergency applications, shall be filed by September 17, 2025. The deadlines for any dispositive motions shall be as follows:
 - Responses to all dispositive motions shall be filed within 30 days of the dispositive motion, but not later than October 17, 2025; and
 - Replies shall be filed within 14 days of any responses to dispositive motions, but not later than October 31, 2025.

IT IS SO ORDERED.

DATED: January 30, 2025.


UNITED STATES DISTRICT JUDGE